

7/12/06

Kimberly A. Miller

Dear Sir or Madam,

I am writing this letter because I am concerned about the proposed Business Opportunity Rule R511993. I believe that in its present form, it could prevent me from continuing as a **lia sophia** Unit Manager. I understand that part of the FTC's responsibilities is to protect the public from "unfair and deceptive acts or practices," yet some of the sections in the proposed rule will make it very difficult, if not impossible, for me to expand my business.

I have been a **lia sophia** Advisor for 3 years and a Unit Manager for the past year of that time period. Originally, I became an Advisor with **lia sophia** because I felt the jewelry was exceptional and I wanted to earn some additional income. Now, I am a Unit Manager and a large portion of my family income is earned through my direct selling business. The future of my family is dependent on my ability to expand my business and the new rules would hinder that significantly.

One of the most confusing and burdensome sections of the proposed rule is the seven-day waiting period to enroll new Advisors. The **lia sophia** sales kit only costs \$149.00. People buy many more expensive items on a daily basis and they do not have to wait seven days. Hand guns are much more expensive than our kit and you only have to wait 3 days for them, plus a hand gun wait is based on a cooling off period to prevent acts of rage. This waiting period gives the impression that there might be something wrong with **lia sophia** or its compensation plan. I believe this waiting period is unnecessary, because **lia sophia** already has an excellent buyback policy for all products including sales kits purchased by an advisor. Under this waiting period requirement, I will need to keep very detailed records when I first speak to someone about the **lia sophia** opportunity and will then need to send in many specialized reports to the **lia sophia** home office.

The proposed rule also calls for the release of **any** information regarding lawsuits involving misrepresentation, or unfair or deceptive practices. It does not matter if my company was found innocent. Today, anyone or any company can be sued for almost any reason. It does not make sense to me that I would have to disclose these lawsuits unless my business or **lia sophia** is found guilty. Otherwise, **lia sophia** and I are put at an unfair advantage even though we have done **nothing** wrong.

Finally, the proposed rule requires the disclosure of a minimum of 10 prior purchasers nearest to the prospective purchaser. I am happy to provide references, but in this day of identity theft, I am very uncomfortable giving out the personal information of individuals (without their approval) to strangers. Also, giving away this information could damage the business relationship of the references who may be involved in other companies or businesses including those of competitors. In order to get the list of the 10 prior purchasers, I will need to send the address of the prospective purchaser to the **lia sophia** home office and

then wait for the list. I also think the following sentence required by the proposed rule will prevent many people from wanting to sign up as an advisor - "If you buy a business opportunity from the seller, your contact information can be disclosed in the future to other buyers." People are very concerned about their privacy and identity theft. They will be reluctant to share their personal information with individuals they may have never met.

I appreciate the work that the FTC does to protect consumers, yet I believe this proposed new rule has many adverse consequences. I feel there are many less burdensome alternatives available to achieving your goals and would hope that you reconsider the rules change you are proposing.

Thank you for your time in considering my comments.

Respectfully,

Kimberly A. Miller